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dba Bella's Hacienda Ranch*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA (RENO)

JANE DOE;

Plaintiff,

v.

**JOSEPH LOMBARDO, Governor of
Nevada, in his official capacity; AARON
FORD, Attorney General of Nevada, in his
official capacity; NYE COUNTY; ELKO
COUNTY; STOREY COUNTY; WESTERN
BEST, INC. D/B/A CHICKEN RANCH;
WESTERN BEST, LLC; DESERT ROSE
CLUB, LLC; HACIENDA ROOMING
HOUSE, INC. D/B/A BELLA'S HACIENDA
RANCH; MUSTANG RANCH
PRODUCTIONS, LLC d/b/a MUSTANG
RANCH LOUNGE, LLC; LEONARD
"LANCE" GILMAN, in his
official capacity; and LEONARD "LANCE"
GILMAN, in his individual capacity,**

Defendants.

Case No. 3:24-cv-00065-MMD-CSD

**DEFENDANT HACIENDA ROOMING
HOUSE, INC. D/B/A BELLA'S
HACIENDA RANCH'S REPLY IN
SUPPORT OF HER MOTION FOR
SANCTIONS [#174]**

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MEMORANDUM OF POINTS AND AUTHORITIES

Defendant Hacienda Rooming House, Inc. d/b/a Bella's Hacienda Ranch ("Bellas") moved for sanctions [#174], Plaintiff Jane Doe responded [#177], and Bellas hereby replies on the grounds, fully reincorporated by reference herein, set forth in the Reply filed by co-Defendants Mustang Ranch Productions, LLC and Lance Gilman [#178]. She would like to reemphasize four main points presented therein:

1. Brothel Defendants have no way of knowing whether Jane Doe even exists or not. She could be entirely fictional.
2. Jane Doe's counsel has used this case to raise millions of dollars to fund a campaign to illegalize prostitution, not via the constitutionally legitimate method of lobbying for new legislation, but by filing frivolous claims with the aim of making it exceedingly difficult to conduct legitimate business ("lawfare"). This is especially true for Bellas, a small business in rural Northern Eastern, Nevada with a very limited litigation budget.
3. This lawsuit filed by Jane Doe's lawyers is a pattern of reckless and frivolous lawsuits made in 2019, 2021, and 2024 that assert a clearly incognizable cause of action for violating the 13th Amendment on the illegitimate grounds that they are "ending slavery in Nevada." The courtesans that work for Bellas are cared for and treated very well. These baseless allegations are not well taken.
4. Jane Doe's lawyers have used this illegitimate tactic for launching their media and fundraising campaigns. In other words, they are benefitting from doing wrong.

Sanctions are therefore warranted.

DATED: May 22, 2025

STEPHENSON LAW, PLLC

/s/ John Neil Stephenson

By: John Neil Stephenson

Its: Managing Member

*Counsel for Defendant Hacienda Rooming
House, Inc. dba Bella's Hacienda Ranch*

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing, DEFENDANT HACIENDA ROOMING HOUSE, INC. D/B/A BELLA'S HACIENDA RANCH'S REPLY IN SUPPORT OF HER MOTION FOR SANCTIONS [#174] by using the CM/ECF system on the date indicated below. To the best of my knowledge and belief, I certify that participants in the case are registered electronic filing system users and will be served via this Court's CM/ECF system.

DATED: May 22, 2025

STEPHENSON LAW, PLLC

/s/ John Neil Stephenson

By: John Neil Stephenson

Its: Managing Member

*Counsel for Defendant Hacienda Rooming
House, Inc. dba Bella's Hacienda Ranch*